

Bryan W. Shaw, Ph.D., P.E., *Chairman*
Toby Baker, *Commissioner*
Zak Covar, *Commissioner*
Richard A. Hyde, P.E., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 16, 2014

Mr. Roberto Puga, P.G.
Trustee, Texas Custodial Trust
Project Navigator, Ltd.
One Pointe Drive, Suite 320
Brea, CA 92821

RE: TCEQ/EPA Approval of the following documents:

- *Response to TCEQ/EPA Comments received May 2, 2014, regarding the January 2014 Field Demonstration of Zerovalent Iron Treatment Technology in Parker Brothers Arroyo-Status Report, dated July 1, 2014*
- *Revised Responses to TCEQ/EPA Comments received May 2, 2014, regarding the January 2014 Field Demonstration of Zerovalent Iron Treatment Technology in Parker Brothers Arroyo-Status Report, dated and October 31, 2014*

Interim Performance Monitoring for the Second Half 2013
Former ASARCO Smelter site, El Paso, Texas
TCEQ SWR No. 31235; EPA ID No. TXD990757668; Customer No. CN603597782;
Regulated Entity No. RN100219021

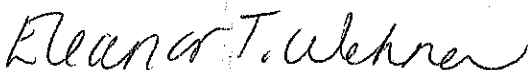
Dear Mr. Puga:

The Texas Commission on Environmental Quality (TCEQ) and the US Environmental Protection Agency (USEPA) acknowledges receipt and has reviewed the above referenced response dated July 1, 2014, and the revised response dated October 31, 2014. The submittals were prepared in response to TCEQ and USEPA's comment letter dated May 2, 2014, regarding review of the January 2013 status report documenting performance monitoring results of the in-situ zerovalent iron (ZVI) treatment technology permeable reactive barriers (PRBs) located in Parker Brothers Arroyo (PBA). A technical teleconference was held on September 25, 2014 between representatives of TCEQ, USEPA and the Texas Custodial Trust to discuss technical aspects of the July 1, 2014 response. As a result of the discussions, representatives of the Texas Custodial Trust further amended the July 1, 2014 response and submitted a revised response on October 31, 2014. The January 31, 2014 status report documents interim performance monitoring through the second half of 2013. The installation of the existing monitoring network supporting the ZVI PRBs was completed in June 2013. Section 6 of the January 31, 2014 monitoring report proposed the implementation of several changes to the program to support the performance monitoring program for 2014. *The TCEQ and USEPA concur with the proposed changes as modified by the July 1, 2014 and October 31, 2014 responses.* Based on our review, the January 31, 2014 status report, as amended by the July 1, 2014 and October 31, 2014 submittals, is acceptable. Please continue with future PRB performance monitoring and reporting efforts.

Mr. Roberto Puga, P.G.
Page 2
December 16, 2014
TCEQ SWR No. 31235

Questions concerning this letter should be directed to me at (512) 239-6542. When responding by mail, please submit an original and one copy of all correspondence and reports to the TCEQ Remediation Division at Mail Code MC-127 with an additional copy submitted to the USEPA and local TCEQ Region 6 Office.

Sincerely,



Eleanor T. Wehner, P.G.
Project Manager
VCP-CA Section
Remediation Division
Texas Commission on Environmental Quality

ETW/jdm

cc: Mr. Scott M. Brown, P.E., Project Manager, Malcolm Pirnie, Inc., 410 N. 44th Street, Suite 1000, Phoenix, AZ 85008
Mr. Charles Fisher, Superfund Division, U.S. EPA Region 6 (Mail Code 6SF-RA), 1445 Ross Ave, Dallas, TX 75202 Dallas
Ms. Lorinda Gardner, Region Director, TCEQ Region 6 Office, El Paso